

Exhibit B



New York City Campaign Finance Board
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June 16, 2025
By CFB Portal

Vito Pitta
Eric Adams 2021
Eric Adams 2025

Dear Vito Pitta:

The Campaign Finance Board (“CFB”) requires information from the 2021 and 2025 campaigns of Eric Adams (the 2021 Campaign and 2025 Campaign; collectively the Campaigns). As you are counsel to both campaigns, we are making a single request and sending it to both Portal accounts. Please respond jointly or individually as you prefer. A response is required by July 11, 2025.

CFB staff is reviewing the public funds eligibility of the Eric Adams 2025 Campaign. The CFB has reason to believe that the Campaigns committed violations of various federal statutes, Campaign Finance Act provisions, and/or Board Rules. In connection with the Board’s consideration of this issue, please provide the documents listed below.

On November 15, 2024, the CFB sent a letter requiring information from the Campaigns with a December 6, 2024 response date. On December 5, you responded by phone, declining to provide the requested information. On April 11, 2025, the CFB repeated its request for information contained in the November 15 letter and made an additional document request. On April 14, 2025, the Campaigns responded to the November 15 letter, stating that the Campaigns found no documentation responsive to the request that had not already been submitted to the CFB. On May 16, 2025, the Campaigns responded in substantially the same way to the April 11 letter. The Campaigns’ responses stated that past and current employees, consultants, and agents of the committees were contacted to request the production of responsive documentation, but they did not produce any relevant documentation. Please provide a list of the current and past employees, consultants and agents that were contacted by the Campaigns in connection to these requests.

However, the Campaigns’ responses did not indicate that Eric Adams (the “Candidate”) was contacted and asked for relevant documentation responsive to these requests. Therefore, the documentation requests from the November 15 and April 11 letters are restated in sections 1 and 2 below in full and the Campaigns must provide any responsive documentation from the Candidate. Additionally, the CFB has reviewed documents related to *United States. v. Eric Adams* (24-cr-556) released by the Department of Justice on May 9, 2025 (“DOJ Documents”) and has additional document requests based on that review. Additional specific documentation requests relating to previous CFB requests are in italics. New document requests have been included in a separate section. For the additional (italicized in section 1) and new (section 3) requests, the Campaigns must provide responsive documentation from the Candidate as well as current and past employees, consultants, and agents of the Campaigns.

**I. November 15, 2024 Documentation Requests Including Additional Requests
(Italicized) Based on DOJ Document Review**

Regarding the alleged June 22, 2018 fundraiser referenced in ¶19 of the indictment, which was not reported to the CFB:

- Documents associated with the event, including promotional materials, fundraiser documentation, and a list of contributions associated with the event. In addition, state whether any of the contributions were intermediated and if so, provide an intermediary statement.
- All campaign communications relating to the event, including but not limited to those to or from the Turkish Official (Reyhan Özgür), the Airline Manager (Cenk Öcal) and/or the Adams Staffer (Rana Abbasova).
 - *Communications between Eric Adams and Rana Abbasova on or about June 22, 2018 in which Eric Adams directed and/or encouraged Abbasova, either directly or implied, to pursue the contribution scheme with the Promoter (Arda Sayiner).*
 - *Communications and any associated attachments to/from the Adams Fundraiser (Brianna Suggs), Rana Abbasova or any other representative of the 2021 Campaign on or about June 28, 2018, including a list titled “The list for 6/22/18”.*

Regarding the alleged December 10, 2020 fundraiser referenced in ¶28, which was not reported to the CFB:

- Documents associated with the event, including promotional materials, fundraiser documentation, and a list of contributions associated with the event. In addition, state whether any of the contributions were intermediated and if so, provide an intermediary statement.
- All campaign communications relating to the event, including but not limited to those to or from Adams Employee-1 (Mohamed Bahi) and Adams Employee-2 (Ahsan Chughtai).

- *Communications between Mohamed Bahi, Ahsan Chughtai, and/or Businessman-4 (Tolib Mansurov) in December 2020 requesting a \$10,000 contribution from Tolib Mansurov, explaining the benefits of providing such a contribution, and/or instructing and/or advising Tolib Mansurov on how to go about making contributions and/or straw donations through Tolib Mansurov's employees.*

Regarding the May 7, 2021 fundraiser referenced in ¶30:

- All campaign communications relating to the event, including but not limited to those to or from Rana Abbasova, Brianna Suggs, Reyhan Özgür and/or Businessman-5 (Erden Arkan).
 - *Communications between Eric Adams, Brianna Suggs, Erden Arkan, and/or Reyhan Özgür regarding plans for the fundraising event for the 2021 Campaign made between April 11, 2021 and May 7, 2021 or thereabouts.*
 - *Communications on or about May 7, 2021 between Brianna Suggs and/or Rana Abbasova and any individual regarding contribution forms and/or other forms.*
 - *Communications that occurred after the fundraising event to and/or from Rana Abbasova and/or between Eric Adams and Rana Abbasova in which she relayed Reyhan Özgür's pledge to continue supporting Eric Adams.*
 - *Communications, including accompanying documents and/or attachments, between Erden Arkan, Rana Abbasova, and/or other individuals associated with the 2021 Campaign regarding invoices and/or receipts for food, drinks, and/or other items related to the fundraising event for the 2021 Campaign.*
 - *Communications, including accompanying documents and/or attachments, sent to and/or by Erden Arkan on or about May 10, 2021, including a handwritten document entitled "Eric Adams 2021 Donation" or similar language.*

Regarding contributions from employees of Bay Atlantic University referenced in ¶31:

- All campaign communications to or from Rana Abbasova and/or Businessman-1 (Enver Yucel) relating to contributions received from employees of Bay Atlantic University on or around September 27, 2021.
 - *Communications between Rana Abbasova, Brianna Suggs, and/or Eric Adams on or about August 27, 2021 regarding the creation of a fundraising link for collecting contributions and/or straw donations from and/or through Bay Atlantic University, and/or Enver Yucel.*
 - *Communications between Rana Abbasova, Brianna Suggs, and/or Eric Adams between October 10 and October 12, 2021 regarding contributions from and/or through employees of Bay Atlantic University.*

Regarding the Sept 20, 2023 fundraiser referenced in ¶45:

- All campaign communications relating to the event, including but not limited to those to or from Arda Sayiner.

Regarding the October 9, 2023 fundraiser referenced in ¶46:

- All campaign communications relating to the event, including but not limited to those to or from Businessman-6 (Eyup “Peter” Ulu) and Rana Abbasova.
 - *Communications between Rana Abbasova and Brianna Suggs in or about August and September 2023 regarding processes, logistics, and/or mechanisms for the fundraising event for the 2025 Campaign, including the creation of a fundraising link for the event.*
 - *Communications between Rana Abbasova and Brianna Suggs on or about September 29, 2023 and afterward regarding fundraising tallies.*
 - *Communications between Rana Abbasova and Brianna Suggs on or about October 8, 2023 regarding whether or not the fundraising event for the 2025 Campaign would hit the fundraising goal.*
- All communications with Rana Abbasova regarding Eyup Ulu and/or fundraising by employees or owners of PortX Transportation Company.
 - *Communications between Rana Abbasova, Eric Adams, and/or Eyup Ulu on or about October 9, 2023 regarding plans for a dinner intended to take place in November 2023 and include Eric Adams and Eyup Ulu.*

II. April 11, 2025 Documentation Requests

Regarding an alleged 2021 Campaign office in the New World Mall and/or elsewhere in Flushing used by Winnie Greco, Tian Ji Li and/or other representatives of the 2021 Campaign:

- Documents associated with the office(s), including any lease, invoices, receipt of payment, and any expenditures related to the operation of the office(s).
- All campaign communications relating to the use of the office(s), including but not limited to all communications to or from Winnie Greco, Tian Ji Li and/or other representatives of the 2021 Campaign and any owner, operator, or employee of New World Mall.

Regarding the August 8, 2021, fundraising event at or near Lian Wu Shao’s home reported by the 2021 Campaign:

- All documentation and communications related to contributions and/or expenditures associated with the fundraiser.
- All campaign communications to or from any Campaign staff and/or volunteers with Lian Wu Shao.

Regarding contributions associated with the October 10, 2019 fundraising event at Affable Eatery Inc/Phoenix Grand Restaurant reported by the 2021 Campaign:

- All documentation and communications related to contributions associated with the fundraiser.

- All campaign communications to or from any Campaign staff and/or volunteers with Hai Mo Zhong or any owner, operator, or employee of AC & Appliances Center, Affable Eatery, and/or Phoenix Grand Restaurant.

Regarding the April 18 and June 18, 2021 fundraising events held at Royal Queen reported by the 2021 Campaign:

- All documentation and communications related to contributions associated with either fundraiser.
- All campaign communications to or from any Campaign staff and/or volunteers with any owner, operator, or employee of Royal Queen, New World Mall, Renhe Market and/or Jmart.

Regarding contributions associated with fundraisers hosted by Weihong Hu, Xiaozhuang Ge and/or Lan Mei for the Campaigns:

- Any and all documentation and communications related to fundraising events hosted by Hu, Ge or Mei, including all communications between campaign staff and/or volunteers to or from Hu, Ge or Mei relating to fundraising. These documents and communications should include, but are not limited to fundraisers:
 - held on or about June 3, 2021;
 - held in or about September 2021;
 - held on or about June 9, 2023 at Hudson Yards;
 - held at any property owned by Hu.
- All documentation and communications related to contributions solicited, intermediated and/or delivered by Ge, Hu, Mei, and/or any owner and/or employee of Wyndham Garden Hotel in Fresh Meadows, Queens.

Regarding any contributions solicited, intermediated, and/or delivered by Hui Qin:

- All documentation and communications related to contributions solicited, intermediated, and/or delivered by Hui Qin, including information on any reimbursements.
- All documentation and communication related to contributions made by Hui Qin or Duo Liu, including information on any reimbursements.
- All documentation and communication related to contributions made by Jonathan Chau, including information on any reimbursements.

Regarding any contributions solicited, intermediated, and/or delivered by owners and/or employees of SB HVAC Services Corporation:

- All documentation and communications related to contributions solicited, intermediated and/or delivered by Hung Yau, and any other owner and/or employee of SB HVAC Services Corporation.
- All campaign communications to or from any Campaign staff and/or volunteers with Hung Yau, and any other owner and/or employee of SB HVAC Services Corporation.

III. Additional Documentation Requests Based on DOJ Document Review

- Communications between Rana Abbasova and Eric Adams in October and/or November 2018 regarding meetings with individuals associated with Turkey, including communications on or about November 6, 2018 in which Eric Adams stated that “we should move to the next level” or similar language.
- Communications between Rana Abbasova and Eric Adams in or about January 2019 regarding confirming Enver Yucel’s willingness to support the 2021 Campaign.
- Regarding an alleged February 22, 2019 event for the 2021 Campaign which was not reported to the CFB:
 - Documents associated with the event, including promotional materials, fundraiser documentation, and a list of contributions associated with the event. In addition, state whether any of the contributions were intermediated and if so, provide an intermediary statement.
 - All campaign communications relating to the event, including but not limited to those to or from Reyhan Özgür, Cenk Öcal and/or Rana Abbasova.
- Regarding contributions from employees of DHCare NY LLC made to the Campaigns in or about October 2020, March 2021, and March 2023:
 - All documentation and communications from any Campaign staff and/or volunteers, including but not limited to Mohamed Bahi and Ahsan Chughtai, with Shahriar Rahman and/or any employees of DHCare NY LLC.
- Communications between Rana Abbasova and Eric Adams on or about July 9, 2021 regarding a potential fundraising event for the 2021 Campaign and/or whether Adams would appear at this event personally.
- Communications between Rana Abbasova and Eric Adams after her communications with Arda Sayiner on or about July 11, 2021, regarding potential net donations that the 2021 Campaign could receive from and/or through Arda Sayiner.
- Communications between Rana Abbasova and Eric Adams in or about August 2021 informing Eric Adams of a plan for obtaining contributions and/or straw donations from and/or through Enver Yucel, and/or Eric Adams approving of said plan.
- Regarding an alleged March 17, 2023 event for the 2025 Campaign which was not reported to the CFB:

- Documents associated with the event, including promotional materials, fundraiser documentation, and a list of contributions associated with the event. In addition, state whether any of the contributions were intermediated and if so, provide an intermediary statement.
- All campaign communications relating to the event to or from any Campaign staff and/or volunteers, including but not limited to Mohamed Bahi, Brianna Suggs, and Rana Abbasova and Shahriar Rahman and/or any employees of DHCare NY LLC.
 - Communications on or about March 7, 2023 between Brianna Suggs and Shahriar Rahman and/or any employees of DHCare NY LLC regarding the coordination of the event and/or associated contributions.
- Communications between Tolib Mansurov and Eric Adams in 2023, including those made on or about June 13, 2023 and June 14, 2023.
- Regarding the June 16, 2023 fundraising event held at the St. James Theater for the 2025 Campaign:
 - Documents associated with the event, including promotional material and fundraiser documentation. In addition, state whether any of the contributions were intermediated and if so, provide an intermediary statement.
 - All campaign communications related to the event to or from any Campaign staff and/or volunteers, including but not limited to Mohamed Bahi and Ahsan Chughtai, with Tolib Mansurov and/or any employees of United Elite Group LLC or Global Industries LLC.
 - Communications on or about June 14, 2023, between Tolib Mansurov, Ahsan Chughtai, Mohamed Bahi or any Campaign staff and/or volunteers, including those regarding donating tickets.
 - Any and all communications on or about June 16, 2023, between Tolib Mansurov, Ahsan Chughtai, Mohamed Bahi or any Campaign staff and/or volunteers, including those regarding donating tickets.
- Communications between Rana Abbasova, Brianna Suggs and/or Eric Adams in or about the summer of 2023 regarding Arda Sayiner's offer to procure contributions and/or straw donations in exchange for Eric Adams' appearance at a fundraising event for the 2025 Campaign, and/or Eric Adams' direction of Rana Abbasova to work with Brianna Suggs to obtain these contributions.
- Communications on or about October 10, 2023 between Tolib Mansurov and Rana Abbasova, Brianna Suggs and/or any other representative of the 2025 Campaign regarding scheduling a fundraiser.
 - Any other communications between Tolib Mansurov, Brianna Suggs, and/or any other individual associated with the 2021 Campaign and/or 2025 Campaign in or about October 2023.

- Communications between Eric Adams, Tolib Mansurov, and/or Mohamed Bahi on or about May 2024 regarding the potential provision and/or organization of twenty \$250 contributions and/or a \$5,000 contribution to the 2025 Campaign.

In addition to the foregoing requests, please provide a list of all contributions that the Campaigns have knowledge of that were not obtained in compliance with the Charter, Act, and Rules.

Please submit this information by Friday, July 11, 2025 via email to me at jschaffer@nyccfb.info. Failure to respond timely or adequately may result in ineligibility for public funds payments. If you have any questions about this request, please contact me. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jesse Schaffer", written in a cursive style.

Jesse Schaffer
Director of Special Compliance